

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

RYAN DUMAS	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 17-00510-CV-HFS
	)	
JACKSON COUNTY,	)	
MISSOURI, et al.	)	
	)	
Defendants.	)	

**DEFENDANTS JACKSON COUNTY AND PICCININI'S RESPONSE TO  
PLAINTIFF'S MOTION FOR LEAVE TO AMEND**

Defendants Jackson County and Joe Piccinini hereby respond to Plaintiff's Motion for Leave to File an Amended Complaint (ECF No. 5). Plaintiff filed his motion seeking leave to amend under Federal Rule of Civil Procedure 15(a)(2). *See* ECF No. 5, ¶ 10. Upon review of the Rules and the record, however, it appears that meant to file pursuant to Rule 15(a)(1)(b). Thus, Plaintiff is within the time to amend as a matter of course.

In light of these facts, Defendants respectfully request that the Amended Complaint be deemed filed as of the date of this filing. Thereby requiring Defendants' responsive pleading be due on or before July 26, 2017.

WHEREFORE, Defendants Jackson County, Missouri and Joe Piccinini respectfully request that their responsive pleading to Plaintiff's Amended Complaint be due on or before July 26, 2017.

Respectfully submitted,

OFFICE OF THE COUNTY COUNSELOR

/s/ Audrey L. Danner

Assistant County Counselor

Missouri Bar No. 65863

Jackson County Courthouse

415 E. 12<sup>th</sup> Street, 2<sup>nd</sup> Floor

Kansas City, Missouri 64106

Phone: (816) 881-3355

Fax: (816) 881-3398

aldanner@jacksongov.org

*Attorney for Defendants Jackson County,  
Missouri & Piccinini*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notice to all parties of record, including:

Jeremy D. Hollingshead  
7777 Bonhomme Ave, Suite 2401  
St. Louis, Mo 63105  
Jhollingshead@hdttriallawyers.com

/s/ Audrey L. Danner

Attorney for Defendants